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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

Julie A. Su,  
Acting Secretary of Labor,  
United States Department of Labor,

Petitioner/Plaintiff,

vs.

NAB LLC d/b/a NAB Nail Salon d/b/a NAB  
Nail Bar, a Nevada limited liability  
corporation; Asia Trinh, an individual and  
managing agent of the Corporate Defendant;  
Nicole Brown, an individual and Managing  
agent of the Corporate Defendant,

Respondents/Defendants.

Case No. 2:21-cv-00984-JAD-VCF

**STIPULATION AND ORDER TO  
WITHDRAW DEFENDANT NICOLE  
BROWN'S MOTION TO DISMISS [ECF 65]  
WITHOUT PREJUDICE**

ECF Nos. 65, 69

Respondent/Defendant NICOLE BROWN by and through her counsel of record, the law firm of LEWIS BRISBOIS BISGAARD & SMITH LLP, and Petitioner/Plaintiff JULIE A. SU, Acting Secretary of Labor, United States Department of Labor, by and through her counsel of record for UNITED STATES DEPARTMENT OF LABOR, and hereby stipulate to withdraw Respondent/Defendant Nicole Brown's Motion to Dismiss [ECF 65] without prejudice to allow refile at a future date, if appropriate.

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1 **IT IS SO STIPULATED.**

2 DATED this 15<sup>th</sup> day of September, 2023

DATED this 15<sup>th</sup> day of September, 2023

3 **LEWIS BRISBOIS BISGAARD &**  
4 **SMITH LLP**

**UNITED STATES DEPARTMENT OF**  
**LABOR**

5 /s/ Jeffrey D. Winchester

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UNITED STATES DEPARTMENT OF LABOR

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16 **ORDER**

17 Based on the parties' stipulation [ECF No. 69] and good cause appearing, IT IS ORDERED  
18 that Nicole Brown's motion to dismiss [ECF No. 65] is deemed withdrawn without prejudice.  
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22 UNITED STATES DISTRICT JUDGE  
23 September 18, 2023  
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